

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) CRIMINAL NO. *15CR10336*
v.)
RICHARD ALAN HERSEY,) VIOLATIONS:
Defendant)
) COUNTS ONE AND TWO: 18 U.S.C.
) §641 - Theft of Public Money
)) CRIMINAL FORFEITURE: 18 U.S.C.
) §981(a)(1)(C); 28 U.S.C.
) §2461(c)

INFORMATION

The United States Attorney charges that:

COUNT ONE: (18 U.S.C. §641 — Theft of Public Money)

From in or about February 1991, and continuing through in
or about February 2015, in the District of Massachusetts,

RICHARD ALAN HERSEY,
defendant herein, did knowingly and willfully embezzle, steal,
purloin, and convert to his own use, on a recurring basis, money
belonging to the United States and a department and agency
thereof in a total amount greater than \$1,000, namely, Social
Security benefits having a value of approximately \$227,476.

All in violation of Title 18, United States Code, Section
641.

The United States Attorney further charges that:

COUNT TWO: (18 U.S.C. §641 — Theft of Public Money)

From in or about February 1991, and continuing through in or about January 2013, in the District of Massachusetts,

RICHARD ALAN HERSEY,

defendant herein, did knowingly and willfully embezzle, steal, purloin, and convert to his own use, on a recurring basis, money belonging to the United States and a department and agency thereof in a total amount greater than \$1,000, namely, Civil Service Retirement System annuity payments having a value of approximately \$216,913.

All in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATIONS: (18 U.S.C. §981(a)(1)(C) and
28 U.S.C. §2461(c))

The United States Attorney further charges that:

1. Upon conviction of one or more of the offenses in violation of 18 U.S.C. §641 charged in Counts One and Two of this Information,

RICHARD ALAN HERSEY, defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. §981(a)(1)(C) and 28 U.S.C. §2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to at least \$444,389 in United States currency.

2. If any of the property described in Paragraph 1, as a result of any act or omission of the defendant --

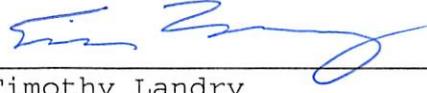
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. §2461(c), incorporating 21 U.S.C. §853(p), to seek forfeiture of all other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c).

CARMEN M. ORTIZ
United States Attorney

By:



Timothy Landry
Special Assistant U.S. Attorney

November 5, 2015